

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

**CONFIRMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court
JUN 06 2011**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.

**01 LENNY DYKSTRA (02/10/1963),
02 ROBERT LESLIE HYMERS (11/02/1983), and
03 CHRISTOPHER GAVANIS (11/29/1980)**
Defendant(s).

CASE NO. PA070678

**FELONY COMPLAINT
FOR ARREST WARRANT**

BY: *John A. Clarke, Executive Officer/Clerk*
DEPUTY

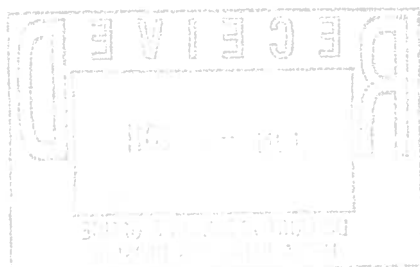
The undersigned is informed and believes that:

COUNT 1

On or about January 12, 2011, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT AUTO, in violation of PENAL CODE SECTION 664/487(d)(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully attempted to take an automobile, 2011 MERCEDES BENZ S-550.

COUNT 2

On or about January 12, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.



COUNT 3

On or about January 12, 2011, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did willfully and unlawfully obtain personal identifying information of WILBERTO HERNANDEZ and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of WILBERTO HERNANDEZ.

* * * * *

COUNT 4

On or about January 12, 2011, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT AUTO, in violation of PENAL CODE SECTION 664/487(d)(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully attempted to take an automobile, 2011 CADILLAC DTS.

* * * * *

COUNT 5

On or about January 12, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

* * * * *

COUNT 6

On or about January 12, 2011, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did willfully and unlawfully obtain personal identifying information of WILBERTO HERNANDEZ and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of WILBERTO HERNANDEZ.

COUNT 7

On or about January 15, 2011, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT AUTO, in violation of PENAL CODE SECTION 664/487(d)(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully attempted to take an automobile, 2011 CADILLAC CTS-V.

COUNT 8

On or about January 15, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

COUNT 9

On or about January 15, 2011, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did willfully and unlawfully obtain personal identifying information of WILBERTO HERNANDEZ and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of WILBERTO HERNANDEZ.

* * * * *

COUNT 10

On or about January 15, 2011, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT AUTO, in violation of PENAL CODE SECTION 664/487(d)(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully attempted to take an automobile, 2011 CADILLAC DTS.

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COUNT 11

On or about January 15, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

* * * * *

COUNT 12

On or about January 15, 2011, in the County of Los Angeles, the crime of IDENTITY THEFT, in violation of PENAL CODE SECTION 530.5(a), a Felony, was committed by LENNY DYKSTRA and ROBERT LESLIE HYMERS, who did willfully and unlawfully obtain personal identifying information of WILBERTO HERNANDEZ and used that information for an unlawful purpose and to obtain, and attempt to obtain credit, goods, services, real property, and medical information without the consent of WILBERTO HERNANDEZ.

COUNT 13

On or about January 28, 2011, in the County of Los Angeles, the crime of GRAND THEFT AUTO, in violation of PENAL CODE SECTION 487(d)(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully take an automobile, 2011 FORD FLEX.

COUNT 14

On or about January 28, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

COUNT 15

On or about January 28, 2011, in the County of Los Angeles, the crime of GRAND THEFT AUTO, in violation of PENAL CODE SECTION 487(d)(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully take an automobile, 2011 LINCOLN MKS.

COUNT 16

On or about January 28, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

COUNT 17

On or about January 28, 2011, in the County of Los Angeles, the crime of GRAND THEFT AUTO, in violation of PENAL CODE SECTION 487(d)(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully take an automobile, 2011 FORD MUSTANG.

COUNT 18

On or about January 28, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA, ROBERT LESLIE HYMERS and CHRISTOPHER GAVANIS, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

* * * * *

COUNT 19

On or about April 13, 2011, in the County of Los Angeles, the crime of ATTEMPTED GRAND THEFT AUTO, in violation of PENAL CODE SECTION 664/487(d)(1), a Felony, was committed by LENNY DYKSTRA, who did unlawfully attempted to take an automobile, 2009 MERCEDES BENZ E-350.

* * * * *

COUNT 20

On or about April 13, 2011, in the County of Los Angeles, the crime of FALSE FINANCIAL STATEMENT, in violation of PENAL CODE SECTION 532a(1), a Felony, was committed by LENNY DYKSTRA, who did unlawfully make and cause to be made a false financial statement in violation of this section by using a fictitious name, social security number, business name, business address and by representing himself to be another person and another business.

* * * * *

COUNT 21

On or about April 14, 2011, in the County of Los Angeles, the crime of POSSESSION OF A CONTROLLED SUBSTANCE, in violation of HEALTH & SAFETY CODE SECTION 11350(a), a Felony, was committed by LENNY DYKSTRA, who did unlawfully possess a controlled substance, to wit, cocaine. "NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."

COUNT 22

On or about April 14, 2011, in the County of Los Angeles, the crime of POSSESSION OF A CONTROLLED SUBSTANCE, in violation of HEALTH & SAFETY CODE SECTION 11377(a), a Felony, was committed by LENNY DYKSTRA, who did unlawfully possess a controlled substance, to wit, Methylenedioxymethamphetamine (Ecstasy). "NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."

COUNT 23

On or about April 14, 2011, in the County of Los Angeles, the crime of POSSESSION OF A CONTROLLED SUBSTANCE, in violation of HEALTH & SAFETY CODE SECTION 11350(a), a Felony, was committed by LENNY DYKSTRA, who did unlawfully possess a controlled substance, to wit, cocaine. "NOTICE: Conviction of this offense will require you to register pursuant to Health and Safety Code section 11590. Failure to do so is a crime pursuant to Health and Safety Code section 11594."

COUNT 24

On or about April 14, 2011, in the County of Los Angeles, the crime of POSSESSION OF A CONTROLLED SUBSTANCE, in violation of BUSINESS & PROFESSIONS CODE SECTION 4060, a Misdemeanor, was committed by LENNY DYKSTRA, who did knowingly and unlawfully possess SOMATROPIN, a controlled substance without a prescription.

* * * * *

COUNT 25

On or about April 14, 2011, in the County of Los Angeles, the crime of UNAUTHORIZED POSSESSION OF HYPODERMIC NEEDLE OR SYRINGE, in violation of BUSINESS & PROFESSIONS CODE SECTION 4140, a Misdemeanor, was committed by LENNY DYKSTRA, who did unlawfully have in his/her possession and under his/her control a hypodermic needle and syringe.

It is further alleged as to count(s) 13, 14, 15, 16, 17 and 18 that in the commission of the above offense(s) the said defendant(s), CHRISTOPHER GAVANIS, ROBERT LESLIE HYMERS and LENNY DYKSTRA, with the intent to do so, took, damaged, and destroyed property of a value exceeding \$50,000, within the meaning of Penal Code section 12022.6(a)(1).

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR.

Further, attached hereto and incorporated herein are official reports and documents of a law enforcement agency which the undersigned believes establish probable cause for the arrest of defendant(s) LENNY DYKSTRA, ROBERT LESLIE HYMERS, CHRISTOPHER GAVANIS for the above-listed crimes. Wherefore, a warrant of arrest is requested for LENNY DYKSTRA, ROBERT LESLIE HYMERS, CHRISTOPHER GAVANIS.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER PA070678, CONSISTS OF 25 COUNT(S).

Executed at SAN FERNANDO, County of Los Angeles, on June 6, 2011.


DETECTIVE J. CONTRERAS
DECLARANT AND COMPLAINANT

STEVE COOLEY, DISTRICT ATTORNEY

BY: 
ALEXANDER M. KARKANEN, DEPUTY

AGENCY: LAPD - I/O: ID NO.: PHONE:
BUNCO/FORGERY
DR NO.: 111908693 OPERATOR: BN PRELIM. TIME EST.: 1 DAY(S)

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RTN DATE</u>
DYKSTRA, LENNY	021194249	2/10/1963	2707805	\$500,000	
HYMERS, ROBERT LESLIE	029300397	11/2/1983		\$500,000	
GAVANIS, CHRISTOPHER	031944992	11/29/1980	2707822	\$175,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant(s), the warrant is so ordered.

LENNY DYKSTRA

BAIL: \$ _____

ROBERT HYMERS

BAIL: \$ _____

CHRISTOPHER GAVANIS

BAIL: \$ _____

DATE: _____

Judge of the Above Entitled Court

NON-WARRANT DEFENDANTS:

<u>DEFENDANT</u>	<u>CH NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY RTN DATE</u>
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FELONY COMPLAINT – ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

LENNY DYKSTRA

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
2	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
3	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
4	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
5	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
6	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
7	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
8	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
9	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
10	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
11	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
12	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
13	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
14	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
15	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
16	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
17	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
18	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
19	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
20	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
21	HS 11350(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
22	HS 11377(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
23	HS 11350(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
24	BP 4060	6 Mo.	PC 12022.6(a)(1)	+1 Yr.
25	BP 4140	6 Mo.	PC 12022.6(a)(1)	+1 Yr.

ROBERT LESLIE HYMERS

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
2	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
3	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
4	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
5	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
6	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
7	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
8	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
9	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
10	PC 664/487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
11	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
12	PC 530.5(a)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
13	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
14	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
15	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
16	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
17	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.

18 PC 532a(1) 16-2-3 PC 12022.6(a)(1) +1 Yr.

CHRISTOPHER GAVANIS

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
13	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
14	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
15	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
16	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
17	PC 487(d)(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.
18	PC 532a(1)	16-2-3	PC 12022.6(a)(1)	+1 Yr.

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

LENNY DYKSTRA _____ Dollars

ROBERT LESLIE HYMERS _____ Dollars

CHRISTOPHER GAVANIS _____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

LENNY DYKSTRA _____ in Dept _____

ROBERT LESLIE HYMERS _____ in Dept _____

CHRISTOPHER GAVANIS _____ in Dept _____

at: _____ A.M.

Date: _____

Committing Magistrate